STATE OF NEW HAMPSHIRE DEPARTMENT OF STATE

)
IN THE MATTER OF:))
Local Government Center, Inc.;)
Local Government Center Real Estate, Inc.;)
Local Government Center Health Trust, LLC;)
Local Government Center Property-Liability Trust,)
LLC;)
Health Trust, Inc.;)
New Hampshire Municipal Association Property-Liability) Case No: C2011000036
Trust, Inc.;)
LGC – HT, LLC;)
Local Government Center Workers' Compensation)
Trust, LLC;)
And the following individuals:)
Maura Carroll; Keith R. Burke; Stephen A. Moltenbrey;)
Paul G. Beecher; Robert A. Berry; Roderick MacDonald;)
Peter J. Curro; April D. Whittaker; Timothy J. Ruehr;)
Julia A. Griffin; and John Andrews)
)
RESPONDENTS)
)

MOTION FOR VOLUNTARY DISMISSAL OF COUNT VI (CONSPIRACY)

NOW COMES the Petitioner in the above-referenced matter, the Bureau of Securities Regulation, by and through its attorneys, Bernstein, Shur, Sawyer, & Nelson, P.A., and moves to voluntarily dismiss Count VI of the Amended Petition that alleges a civil conspiracy because, as discussed at the recent hearing, there is some redundancy to the count. The Bureau understands that the Respondents do not object to this motion.

WHEREFORE, the Petitioner prays that the Hearings Officer:

- A. Grant this Motion for Voluntary Dismissal of Count VI only; and
- B. For such other and further relief as may be just.

Respectfully submitted,

Bureau of Securities Regulation By and Through Their Attorneys, Bernstein, Shur, Sawyer & Nelson, PA

March 29, 2012

By: _____/s/Andru H. Volinsky____ Andru H. Volinsky (#2634) Bernstein, Shur, Sawyer & Nelson, PA 670 N. Commercial Street, Ste. 108 P.O. Box 1120 Manchester, NH 03105-1120 (603) 623-8700

CERTIFICATION OF SERVICE

I hereby certify that a copy of the Motion for Voluntary Dismissal of Count VI, was this date, forwarded to every attorney on the service list by electronic delivery.

/s/ Andru H. Volinsky	
Andru H. Volinsky	